

EXHIBIT 4

From: Amy L. Barrette
Sent: Wednesday, January 22, 2025 12:05 PM
To: Christopher G. Mavros <cgmavros@zarwin.com>; Rubinson, Michelle <mrubinson@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Jessica Riddle <jriddle@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>; Max Dehon <mdehon@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; delylechappellz1579379@smb.filevineapp.com
Subject: RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February
Importance: High

Michael,
Following up on Chris's email requesting the deposition of Ms. Chappell, Coterra wants to conduct the deposition in person. We are happy to make our Harrisburg office available as it is in the Middle District. Or, it may be more convenient for her to fly to Pittsburgh, so we could do it here as well. Please let me know what dates work for her appearance so that we can get the deposition notice out.

Thanks,

Amy

Amy Barrette
Shareholder

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501 Grant Street, Suite 200
Pittsburgh, PA 15219-4413
412 562 1626 (o)
amy.barrette@bipc.com

Buchanan

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From: Christopher G. Mavros <cgmavros@zarwin.com>
Sent: Thursday, January 9, 2025 12:46 PM
To: Robinson, Michelle <mrubinson@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Amy L. Barrette <amy.barrette@bipc.com>; Jessica Riddle <jriddle@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>; Max Dehon <mdehon@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; delylechappellz1579379@smb.filevineapp.com; Christopher G. Mavros <cgmavros@zarwin.com>
Subject: RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

I am unavailable 3/4 – 10.

With the DED on 3/10, please provide dates for Mrs. Chappell's deposition as well or we can use one of the dates we come up with.

Thanks,
Chris



Christopher G. Mavros, Esq.

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2005 Market Street | 16th Floor | Philadelphia, PA 19103-7042
Main Number: 215.569.2800 | Direct Dial: [267.765.7341](tel:267.765.7341)
Main Fax: 267.386.3306
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From: Rubinson, Michelle <mrubinson@smbb.com>
Sent: Thursday, January 9, 2025 12:38 PM
To: Davis, Jeff <jsdavis@bradley.com>; Amy L. Barrette <amy.barrette@bipc.com>; Jessica Riddle <jriddle@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>; Max Dehon <mdehon@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Rubinson, Michelle <mrubinson@smbb.com>; delylechappellz1579379@smb.filevineapp.com
Subject: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

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Counsel,

*I notice our associate Max Dehon, who works with Drew and Mike- is not on any of these threads – so I am adding him.

Please use this updated list, so Max does not feel left out of all the fun.
Thanks.

Michelle Rubinson

Litigation Paralegal



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Philadelphia, PA 19103
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mrubinson@smbb.com | www.smbb.com

From: Rubinson, Michelle <mrubinson@smbb.com>
Sent: Thursday, January 9, 2025 12:30 PM
To: Davis, Jeff <jsdavis@bradley.com>; Amy L. Barrette <amy.barrette@bipc.com>; Jessica Riddle <jriddle@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith

<tara.klingensmith@bipc.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Rubinson, Michelle <mrubinson@smbb.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in January and February

Counsel, good afternoon:

By way of a summary for scheduling, I would like to confirm the below:

Broady Webster is confirmed for 1/28/25 at 10am. Zoom.

Frank Estes is confirmed for 1/30/25 at 10am. Zoom.

The following witnesses are ideally, to be slotted into the available dates below (that Coterra and Forum are available). Zoom only:

DEPONENTS:

Craig Watts
Bob Goodwin
Troy Holliday
Matt Wallace
Magella Mainguy
Kingsley Menifee
Jeremi Wagner
Bailey Jeffords
Mark Bennett
Joseph Fox
Justin Guthrie

AVAILABLE DATES:

- February 18
- February 19
- February 24
- February 25
- March 3
- March 4
- March 5
- March 6
- March 7
- March 10

Plaintiffs are actively working on confirming availability of the above dates asap.

Michelle Rubinson

Litigation Paralegal



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From: Davis, Jeff <jsdavis@bradley.com>

Sent: Thursday, January 9, 2025 12:04 PM

To: Amy L. Barrette <amy.barrette@bipc.com>; Jessica Riddle <jriddle@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Chris & Michael:

Of the dates provided by Amy, I am currently available on the following – assuming that the requested depositions will be taken remotely:

- February 18
- February 19
- February 24
- February 25
- March 3
- March 4
- March 5
- March 6
- March 7
- March 10

From: Amy L. Barrette <amy.barrette@bipc.com>

Sent: Thursday, January 9, 2025 10:49 AM

To: Jessica Riddle <jriddle@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>

<thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024
Importance: High

Chris,
Coterra is available to participate in the depositions for the 10 witnesses identified below on the following dates: February 3-7, 10-11, 17-21, 24-28 and March 3-7 and 10. Given that these are not likely full 7 hour depositions, it makes sense to try to schedule more than one per day.

Amy

Amy Barrette

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From: Jessica Riddle <jriddle@zarwin.com>
Sent: Thursday, January 9, 2025 11:09 AM
To: Amy L. Barrette <amy.barrette@bipc.com>; Davis, Jeff <jsdavis@bradley.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

I have not received a response from anyone except Amy, please see the below & provide dates. We would like to schedule the deposition of Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Menifee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie.

Additionally, attached are the deposition notices for Broady Webster & Frank Estes.

Thank you!



Jessica Riddle, Paralegal

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Email: jriddle@zarwin.com



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From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Monday, December 16, 2024 2:03 PM
To: Jessica Riddle <jriddle@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024
Importance: High

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Chris,

Brody Webster is available for his deposition on January 28th 2025. Please let me know as soon as possible whether you plan to proceed on that day. For the remainder of the depositions, I am available to participate on the following dates: January 30, February 3-7, Feb 17-21, and Feb 24-28.

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From: Jessica Riddle <jriddle@zarwin.com>
Sent: Monday, December 16, 2024 11:14 AM
To: Davis, Jeff <jsdavis@bradley.com>; Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

We would like to schedule the deposition of Brody Webster, Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Menifee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie. Please provide availability for late January & February.

Thank you!



Jessica Riddle, Paralegal

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From: Davis, Jeff <jsdavis@bradley.com>
Sent: Friday, November 8, 2024 10:25 AM
To: Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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If it is the 23rd, then I am fine with that.

Jeff Davis

Partner | [Bradley](#)
jsdavis@bradley.com
d: 713.576.0370

From: Amy L. Barrette <amy.barrette@bipc.com>

Sent: Friday, November 8, 2024 9:10 AM

To: Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepsia@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Importance: High

Jeff,

I haven't received a response from you on the dates proposed below for Mr. Brown. The start time will have to be 3:35 Central time.

Thanks

Amy Barrette

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(she/her)

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From: Amy L. Barrette <amy.barrette@bipc.com>

Sent: Tuesday, November 5, 2024 12:26 PM

To: Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith

<tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepseria@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Given counsels' schedule conflicts, we will not be able to proceed with Mr. Estes' deposition in December. Do any of you want to proceed with Mr. Brown's deposition the week of the 23rd or 30th if he is available? I do not want to waste time trying to schedule him during that time if counsel is not available. I also want to eliminate any future suggestion that Coterra delayed depositions.

Amy Barrette

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(she/her)

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amy.barrette@bipc.com

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From: Budner, Michael <MBudner@smbb.com>
Sent: Tuesday, November 5, 2024 11:10 AM
To: Davis, Jeff <jsdavis@bradley.com>; Amy L. Barrette <amy.barrette@bipc.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepseria@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

I also have a trial that is scheduled to start on 12/9. It's NJ, so it's technically just a listing, but it's our 9th or 10th listing, so I'm fairly certain that will go, which means I would be unavailable the weeks of 12/9 and 12/16.

Michael Budner

Partner



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From: Davis, Jeff <jsdavis@bradley.com>
Sent: Tuesday, November 5, 2024 11:07 AM
To: Amy L. Barrette <amy.barrette@bipc.com>; Christopher G. Mavros <cgmavros@zarwin.com>;
Budner, Michael <MBudner@smbb.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner
<matthew.pilsner@bipc.com>; Howard, Ty <tHoward@bradley.com>; Tara Klingensmith
<tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy
<abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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All:

My trial that was set for 12/2 has been moved to the week of 12/9, which will likely go the full week and would jeopardize proceeding on 12/12 and 12/13.

We have already mediated the case with no success and we are No. 1 on the docket.

Given the vagaries of trial, I don't have a problem noticing the deposition with the understanding that if I am still in trial, that they will need to be postponed.

Jeff

Jeff Davis
Partner | Bradley
jsdavis@bradley.com
d: 713.576.0370

From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Tuesday, November 5, 2024 9:38 AM
To: Christopher G. Mavros <cgmavros@zarwin.com>; Budner, Michael <MBudner@smbb.com>;
Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner
<matthew.pilsner@bipc.com>; Howard, Ty <tHoward@bradley.com>; Tara Klingensmith
<tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy
<abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Neither I nor Coterra has any control over Mr. Brown's schedule at this point, so I cannot guarantee he will be available during the 12th- 17th, or at any time in December. If all counsel could give me their availability for the 12th through the 17th, that would be a great start.

Amy Barrette**Shareholder**

(she/her)

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amy.barrette@bipc.com

Buchanan[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)**From:** Christopher G. Mavros <cgmavros@zarwin.com>**Sent:** Monday, November 4, 2024 2:51 PM**To:** Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>**Cc:** Chante DePersia <cndepseria@zarwin.com>**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

Thanks, Amy. Would be good to schedule these on the same day if possible.

**Christopher G. Mavros, Esq.**

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In order to keep our attorneys and staff safe during the COVID-19 crisis and further to comply with various orders or suggestions from governmental authorities as to remaining closed during that time, Zarwin, Baum, DeVito, Kaplan, Schaer & Toddy has closed all of our offices. Because all attorneys and staff are working remotely, with respect to all of our client matters, including, but not limited to, any litigation matters, we expect to send all documents (including correspondence, pleadings, and discovery) via e-mail until further notice. Because we may not receive regular mail or other deliveries during this period of time, please e-mail copies of anything you send by regular mail or by overnight or other delivery. Kindly send all e-served and all other documents in your matter or case to the e-mail addresses for any Zarwin Baum attorney who is representing you in your matter or case, or who has communicated with you by e-mail on your matter or case. We appreciate your cooperation in this regard.

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From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Monday, November 4, 2024 2:29 PM
To: Budner, Michael <MBudner@smbb.com>; Christopher G. Mavros <cgmavros@zarwin.com>;
Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner
<matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith
<tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy
<abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Mr. Estes is available for his deposition on the following dates: 12/12, 12/13, 12/16, or 12/17. Please confirm by the end of the week whether any of those dates work for you so that we can lock this in place before his schedule changes. I should have dates for Mr. Brown shortly.

Amy

Amy Barrette

Shareholder

(she/her)

Union Trust Building
501 Grant Street, Suite 200
Pittsburgh, PA 15219-4413
412 562 1626 (o)
amy.barrette@bipc.com

Buchanan

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From: Budner, Michael <MBudner@smbb.com>
Sent: Friday, November 1, 2024 3:12 PM
To: Christopher G. Mavros <cgmavros@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>;

Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

That's fine with me, as well. Thanks.

Michael Budner

Partner



One Liberty Place, 1650 Market Street, 52nd Floor
Philadelphia, PA 19103
+1 215.575.3875 (office) | +1 215.380.9312 (cell)
mbudner@smbb.com | www.smbb.com

From: Christopher G. Mavros <cgmavros@zarwin.com>

Sent: Friday, November 1, 2024 2:04 PM

To: Amy L. Barrette <amy.barrette@bipc.com>; Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: Re: Chappell v Precision Forum's request for deposition dates in December 2024

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Amy, I am fine with these deps being conducted remotely. Thanks

Christopher G. Mavros, Esq.

One Commerce Square

2005 Market Street | 16th Floor | Philadelphia, PA 19103-7042

Main Number: 215-569-
2800

| Direct Fax: 267-765-

Direct Dial: 267-765-7341 0346
Email: cgmavros@zarwin.com



Click here to visit our COVID-19 Resource Center

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From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Thursday, October 31, 2024 11:43 AM
To: Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Howard, Ty <tHoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>; Christopher G. Mavros <cgmavros@zarwin.com>
Cc: Chante DePersia <cnDepersia@zarwin.com>
Subject: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Given the holidays, December is not ideal for the depositions, but I will work on dates. There are logistical issues. Mr. Estes's office is in Texas. If he has to travel, that will impact his available dates. Do all counsel agree to conduct his deposition via video? If not, I propose the deposition be held at Buchanan's office in Pittsburgh. This location will be easier for everyone traveling. That beats everyone having to travel to Susquehanna County.

Please let me know as soon as possible.

Amy Barrette
Shareholder
(she/her)

Union Trust Building
501 Grant Street, Suite 200
Pittsburgh, PA 15219-4413
412 562 1626 (o)

amy.barrette@bipc.com

Buchanan

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

From: Jessica Agger <jagger@zarwin.com>

Sent: Thursday, October 31, 2024 8:34 AM

To: Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Amy L. Barrette <amy.barrette@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Christopher G. Mavros <cgmavros@zarwin.com>; Chante DePersia <cndepersia@zarwin.com>

Subject: RE: #44410 Chappell - Discovery Requests

Good Morning Counsel,

We are withdrawing our requests to Cabot. We would like to schedule depositions of Shane Brown & Frank Estes. Please let me know availability for December.

Thank you!

Jessica Agger, Paralegal

One Commerce Square
2005 Market Street | 16th Floor | Philadelphia, PA 19103-7042
Direct Dial: 215.569.2800 |
Email: jagger@zarwin.com



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From: Jessica Agger

Sent: Friday, October 25, 2024 9:56 AM

To: Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Amy L. Barrette <amy.barrette@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Rubinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Christopher G. Mavros <cgmavros@zarwin.com>; Chante DePersia <cndepersia@zarwin.com>

Subject: #44410 Chappell - Discovery Requests

Good Morning,

Attached please find Defendant, Forum Tech's discovery requests directed to all parties.

Thank you!



Jessica Agger, Paralegal

One Commerce Square
2005 Market Street | 16th Floor | Philadelphia, PA 19103-7042
Direct Dial: [215.569.2800](tel:215.569.2800) |
Email: jagger@zarwin.com



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